

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

In re:)	
)	Chapter 11
Ryan's Electrical Services, LLC,)	
)	Bankruptcy No. 20-00411
Debtor.)	

**REQUEST FOR ALLOWANCE AND PAYMENT OF SECTION 503(b)(9)
ADMINISTRATIVE CLAIM**

Creditor Consolidated Electrical Distributors, Inc. d/b/a Electrical Engineering & Equipment ("3E"), by and through its undersigned counsel, submits this *Request for Allowance and Payment of Section 503(b)(9) Administrative Claim*, and in support thereof respectfully states as follows:

1. On March 25, 2020 (the "Petition Date"), Ryan's Electrical Services, LLC (the "Debtor") filed a petition for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the District of Iowa.
2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. 3E is a distributor of electrical engineering equipment with its principal place of business at 953 73rd Street, Windsor Heights, IA 50324.
4. Within the twenty (20) days immediately preceding the Petition Date (the "503(b)(9) Period"), 3E sold and Debtor received certain goods ("Goods") in the ordinary course of Debtor's business, which have an aggregate value of \$13,421.50 (the "Administrative Expense Claim"). Copies of the invoices detailing the Goods sold to the Debtor during the 503(b)(9) Period, and evidence of delivery, are attached hereto as **Exhibit A** and incorporated by reference. 3E has not been paid for these Goods.

5. Section 503(b)(9) of the Bankruptcy Code, 11 U.S.C. § 503(b)(9), provides that, after notice and a hearing, the bankruptcy court shall allow an administrative expense for claims of a seller for the value of any goods received by the debtor in the ordinary course of business within twenty (20) days prior to the filing of its bankruptcy petition. 3E is entitled to an administrative expense claim for the value of the Goods sold to and received by the Debtor.

6. 3E reserves its right to assert additional claims against the Debtor for amounts not contemplated by this request or allowed by the Court pursuant to § 503(b)(9) of the Bankruptcy Code, and to amend, modify, and/or supplement this request, as appropriate under the circumstances.

WHEREFORE, 3E respectfully asks the Court to enter an order allowing 3E's Administrative Expense Claim pursuant to Section 503(b)(9) of the Bankruptcy Code and grant such other and further relief as this Court deems just and appropriate.

Notice

Please take notice that any objection or resistance to this *Request for Allowance and Payment of Section 503(b)(9) Administrative Claim* must be filed on or before **June 3, 2020** (the "Resistance Date"). If no objection or resistance is timely filed on or before the Resistance Date, the Court may enter an order in favor of the moving party.

Dated this 13th day of May, 2020.

HUSCH BLACKWELL LLP
Attorneys for Consolidated Electrical
Distributors, Inc. d/b/a Electrical Engineering
& Equipment Company

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CERTIFICATE OF SERVICE

I do hereby certify that the foregoing Request for Allowance and Payment of Section 503(b)(9) Administrative Claim was filed with the Clerk of the Court using the CM/ECF system which gave notification electronically upon all parties, and I hereby certify that I have also mailed the same by regular United States mail, postage prepaid, to the following this 13th day of May, 2020:

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/s/ Michael D. Fielding
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